

## **EXHIBIT 12**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

Santana Bryson and Joshua Bryson, as Administrators of the Estate of C.Z.B., and as surviving parents of C.Z.B., a deceased minor,	*
	*
Plaintiffs,	*
	*
v.	*
	*
Rough Country, LLC,	*
	*
Defendant.	*

**PLAINTIFFS' RESPONSES TO DEFENDANT  
ROUGH COUNTRY, LLC'S SECOND INTERROGATORIES**

COME NOW Plaintiffs Santana Bryson and Joshua Bryson in the above captioned matter and responds to Defendant Rough Country LLC's Second Interrogatories to Plaintiff Santana Bryson as follows:

**INTERROGATORY NO. 1:**

Please identify with specificity the contents in the rear cargo area of Plaintiffs' Ford Escape at the time of impact in the Subject Accident, including the make and model of the shop vac and any other items in the rear cargo area of the vehicle.

**RESPONSE:**

Plaintiffs note that they underwent significant trauma, both physical and emotional, on March 15, 2020. That trauma paired with the passage of time has

hampered their independent recollection of details such as the precise contents of their trunk.

By way of further response, Plaintiffs state that they can identify the following list of items which were in their trunk on the date of the impact:

- Shop-Vac, Model SS11-450
- One lightweight “umbrella” stroller. Plaintiffs are unaware of the precise make and model of the stroller.
- Ozark Trail Outdoor Equipment Camping Chair, Model SW17C027RED.
- Ozark Trail Outdoor Equipment Camping Chair, Model SW17C027BLU.
- A bag of clothing.

There may have been other small, miscellaneous items in the trunk, but Plaintiffs cannot remember precisely whether there were such items or what they might have been.

Respectfully submitted on February 1, 2023.

CANNELLA SNYDER LLC

*/s/ Tedra L. Cannella*  
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**ATTORNEYS FOR PLAINTIFFS**

## CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in 14-point Times New Roman font.

CANNELLA SNYDER LLC

*/s/ Tedra L. Cannella*

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## CERTIFICATE OF SERVICE

This is to certify that on February 1, 2023, I served the foregoing pleading on the following counsel of record.

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This 1st day of February, 2023.

CANNELLA SNYDER LLC

BY: /s/ Tedra L. Cannella  
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